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LOCAL BANKRUPTCY FORM 9014-3 IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Christopher Friend

Debtor(s)

CHAPTER 13

U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Corp. 2006-FRE1 Asset Backed Pass-Through Certificates, Series 2006-FRE1

NO. 21-12884 MDC

vs.

Christopher Shawn Friend

11 U.S.C. Section 362 and 1301

Carole K. Friend

Co-Debtor

Debtor(s)

Movant

Kenneth E. West

Trustee

NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

U.S. Bank N.A., as trustee, on behalf of the holders of the J.P. Morgan Mortgage Acquisition Corp. 2006-FRE1 Asset Backed Pass-Through Certificates, Series 2006-FRE1 has filed a Motion for Relief from Stay, with the court for Relief from the Automatic Stay of Section 362 and 1301.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion, then on or before **April 28, 2022** you or your attorney must do <u>all</u> of the following:
 - (a) file an answer explaining your position at:

United States Bankruptcy Court Robert N.C. Nix Building 900 Market Street, Suite 400 Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Bankruptcy Group KML Law Group, P.C.

Suite 5000 – BNY Mellon Independence Center

701 Market Street

Philadelphia, PA 19106-1532

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Magdeline C. Coleman, the United States Bankruptcy Judge, in Courtroom 2 at the United States Bankruptcy Court, Robert

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N.C. Nix Building, 900 Market Street, Suite 400, Philadelphia, Pa. 19107-4299 on **May 10, 2022**, at **10:30 A.M**, or as soon thereafter as counsel can be heard, to consider the motion.

- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

/s/ Rebecca A. Solarz, Esq.

Rebecca A. Solarz, Esquire KML Law Group, P.C. BNY Mellon Independence Center 701 Market Street, Suite 5000 Philadelphia, PA 19106

Phone: (215)-627-1322

Attorneys for Movant/Applicant

April 14, 2022